



Oregon

John A. Kitzhaber, M.D., Governor

Department of Environmental Quality

Northwest Region
2020 SW Fourth Avenue
Suite 400
Portland, OR 97201-4987
(503) 229-5263 Voice
TTY (503) 229-5471

April 20, 2000

Mr. Larry Johnson
Manager, Marine Operations
Foss Maritime Company
9030 NW St. Helens Road
Portland, OR 97231

Re: Comments
Expanded Preliminary Assessment
Foss Maritime Company
Portland Oregon
ESCI No. 2364

Dear Mr. Johnson:

The Oregon Department of Environmental Quality (DEQ) has reviewed the "Expanded Preliminary Summary Report" prepared for the above referenced site in accordance with our Letter Agreement, dated November 18, 1999. This report was prepared by Anchor Environmental, L.L.C. and is dated February 15, 2000.

This report does not satisfy DEQ's requirements for a preliminary assessment (PA) or expanded PA (XPA). The report does not contain sufficient information to assess whether the site is releasing, has released, or could release hazardous substances to the environment and in particular whether the site has contributed to sediment contamination in Portland Harbor. The PA contains minimal information that was not contained in DEQ's November 8, 1999 Strategy Recommendation. The PA should contain detailed information regarding current and past uses of hazardous substances and their potential to have impacted the site. In order for DEQ to approve the document, the PA must be rewritten in accordance with DEQ's PA Guidance Documents (attached). Specifically, the PA must include the following:

- **Ownership and Operation History.** This discussion must include past and current practices, operations, and hazardous substances used.
- **Regulatory History**
- **Past Inspections**
- **Waste Characteristics** including
 - Potential source areas. Potential contaminant source areas should be identified based on a review of historical site information and current site operations. The identification of potential source areas should include

USEPA SF



1187211

DEQ-1

both upland and over or in water operations that may have resulted in a release of hazardous substances to soil, groundwater, surface water, and/or Willamette River sediments.

- Contaminants of Potential Concern (COPC). Hazardous substances used on site (current and past) must be identified and evaluated.
- **Evaluation of Pathways of Exposure**

In addition, the conclusions in this report are not supported by site specific information or findings. Adequate data or documentation is needed to support site conclusions. It is DEQ's expectation that the PA will fully evaluate all upland, in-water, and over-water activities that might have resulted in the release of hazardous substances and that focused sampling will be performed to determine if a release has occurred. Prior to collecting samples, a sampling plan should be prepared in accordance with DEQ's XPA Guidance (attached).

Specific Comments

1. Page 1. Site Background. The PA must document the historical property uses. The statement that the property was unused and undeveloped must be supported and documented. For example, copies of historical aerial photographs and maps (e.g., Sanborne, historical tax lot maps) should be included in the report, as well as a review of reverse directories (e.g., Cole or Polk Directories).

The PA should discuss any dredging that has occurred adjacent to the facility, if any, and present any analytical results associated with historic dredging activities.

2. Page 2. Underground Storage Tanks. The report should include a discussion regarding the closure of the two underground storage tanks (USTs) in 1998 (i.e., Were the tanks closed in accordance with DEQ UST regulations? Was a release reported? Did DEQ's tank program issue a no further action (NFA) finding for these tanks?)
3. Page 2. Underground Storage Tanks. The report should include a discussion of the existing USTs. Why aren't these tanks considered a potential on-site source of contamination?
4. Page 2. Outfalls. Is site storm water discharge regulated? Do the four-inch pipes discharge directly to the Willamette River?
5. Page 3. Adjacent Site Uses. This section does not describe adjacent properties.
6. Page 3. Sediment Quality. The PA should focus on evaluating the potential for a release of hazardous substance at the site and the site's potential contribution to sediment contamination in the Willamette River. The PA should not evaluate risk

using screening tables. Specific sediment quality criteria will be determined for Portland Harbor through the harbor-side remedial investigation/feasibility study. The PA/XPA focus should be evaluating and documenting potential contaminant sources at the Foss facility and determining whether or not these sources have impacted the environment using site specific sampling results.

7. Page 4. Evaluation of Potential Pathways. This section does not adequately assess potential sources of contamination on the site or potential contamination migration or exposure pathways. The identification of potential source areas should include both upland and over or in water operations that may have resulted in a release of hazardous substances to soil, groundwater, surface water, and/or Willamette River sediments. The report identifies several potential contaminant sources uses (e.g., maintenance shop, maintenance barge, USTs,) that may use or have used and/or generated hazardous substances. These areas and the types of contamination that could be present in each should be identified. For example, the general maintenance operations performed at this facility should be described. This information should be used to identify COPCs (e.g., herbicides, petroleum products, fuels, paints, solvents) for the sampling activities.

The PA should identify and evaluate potential contaminant migration pathways (e.g., groundwater discharge, storm water discharge, direct release, volatilization, dust entrainment) and potentially affected media (e.g., groundwater, soil, Willamette River sediments, surface water) at the subject property. XPA sampling efforts should focus on primary migration pathways.

The PA should identify and evaluate potential contaminant exposure pathways (e.g., ingestion, direct contact, inhalation) to humans and ecological receptors associated with the potentially affected media (e.g., groundwater, soil, Willamette River sediments, surface water) at the subject property. XPA sampling efforts should focus on primary migration and exposure pathways.

8. The report does not include a proposed sampling plan. DEQ requests that focused sampling be conducted to determine if a release has occurred at the facility. The PA should include a sampling and analyses plan that is based on a conceptual site model that describes the potential sources of contamination, migration pathways, exposure routes, and contaminants of interest. The PA and XPA needs to take a broad approach of what could be present at the facility based on the specific site uses (both current and historical). The PA identifies the following potential contaminant source areas:

- USTs/fueling area
- Maintenance Building
- Maintenance Barge
- Storm water runoff

- Storage Areas
- Spills (the location, size, and source of the spilled material should be provided)
- City Storm water outfall

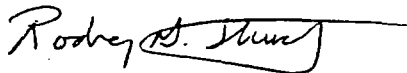
The following should be considered/discussed as potential sources:

- PCB containing transformers or capacitors
- Dock Area (spills from refueling, discharges from barges/ships berthed at the Foss dock)

Sufficient sampling should be proposed to determine whether the above potential sources have resulted in a release of hazardous substance(s).

DEQ would be happy to meet with you and your consultant to discuss our comments. DEQ requests that a revised PA report and sampling plan be submitted to DEQ by May 31, 2000. Please do not hesitate to call me at 229-5562 if you have any questions.

Sincerely,



Rodney G. Struck, R.G.
Project Manager
Voluntary Cleanup and Portland Harbor Section

Enclosure: State Preliminary Assessment (PA) Guidance
Example Report – Preliminary Assessment
Expanded Preliminary Assessment (XPA) Sample Plan Guidance
Expanded Preliminary Assessment (XPA) Report Guidance

cc: ECSI File No. 2364
Mike Rosen, DEQ/NWR
Eric Blischke, DEQ/NWR